

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 19-12042-jkf
Andrena L. Dixon	: Chapter 13
Debtor	:
	:
MTGLQ Investors, LP c/o Rushmore Loan	:
Management Services	:
Movant	:
vs.	:
Andrena L. Dixon	:
Debtor/Respondent	:
and	:
Scott F. Waterman, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Andrena L. Dixon (“Debtor”), as follows:

1. As of the bankruptcy filing date of April 01, 2019, Movant holds a secured Claim against the Debtor’s property located at 5943 N. 3<sup>rd</sup> Street, Philadelphia, Pennsylvania 19120.
2. On June 07, 2019, Movant filed a Proof of Claim citing a total secured claim in the amount of \$87,304.38, with arrears in the amount of \$20,756.55.
3. The Plan currently does not propose payment to Movant for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Dated: 07/11/2019

Respectfully submitted,

/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
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Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for MTGLQ Investors, LP c/o Rushmore Loan Management Services (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 07/11/2019:

David A. Scholl, Esquire  
Via Electronic Filing  
*Attorney for Debtor*

Scott F. Waterman, Esquire  
Via Electronic Filing  
*Trustee*

Andrena L. Dixon  
5943 North 3<sup>rd</sup> Street  
Philadelphia, PA 19120  
Via First Class Mail  
*Debtor*

Date: 07/11/2019

Respectfully Submitted,  
/s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
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